

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.) Civil Action No.
)
\$426,000 IN UNITED STATES)
CURRENCY AND ONE 2009 AUDI Q7,)
Defendants.)

VERIFIED COMPLAINT FOR FORFEITURE IN REM

The United States of America, by its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, in a civil action of forfeiture pursuant 21 U.S.C. §§ 881(a)(4) and 881(a)(6), alleges that:

1. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1335.

Venue is appropriate pursuant to 28 U.S.C. § 1335.

2. The defendant property consists of the following:

- a. \$426,000 in United States currency seized from Jennifer Medina and Alex Tejada on August 31, 2012 in Foxboro, Massachusetts (the “Defendant Currency”); and
- b. one 2009 Audi Q7 bearing serial number WA1AY74L59D012798 and Massachusetts registration number WDL196 seized on August 31, 2012 (the “Defendant Vehicle”)

(collectively, the “Defendant Properties”).

As detailed in the Affidavit of John J. McDonnell, Special Agent with the United States Drug Enforcement Administration, attached hereto as Exhibit A and incorporated herein by reference, the United States has probable cause to believe that the Defendant Currency constitutes property traceable to (1) moneys, negotiable instruments, securities, or other things of value furnished or

intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of the Controlled Substances Act, (2) proceeds traceable to such an exchange, and/or (3) moneys, negotiable instruments, and securities used or intended to be used to facilitate violations of 21 U.S.C. §§ 841 and/or 846 and, therefore, is subject to seizure and forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6); and that the Defendant Vehicle was used, or intended to be used, to transport, or in any manner facilitate the transportation, sale, receipt, possession or concealment of drugs in violation of 21 U.S.C. §§ 841 and/or 846 and, therefore, is subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(4).

WHEREFORE, the United States of America requests:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Marshals Service commanding it to seize the Defendant Properties and give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;
2. That judgment of forfeiture be decreed against the Defendant Properties;
3. That thereafter, the Defendant Properties be disposed of according to law; and
4. For costs and all other relief to which the United States may be entitled.

Respectfully submitted,

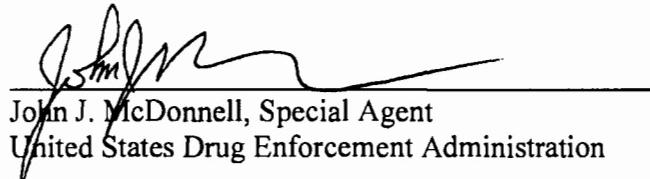
CARMEN M. ORTIZ,
United States Attorney,

By: /s/ Mary B. Murrane
MARY B. MURRANE
Assistant U.S. Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100
mary.murrane@usdoj.gov

Date: March 15, 2013

VERIFICATION

I, John J. McDonnell, Special Agent with the United States Drug Enforcement Administration, state that I have read the foregoing Verified Complaint for Forfeiture *in Rem* and the Affidavit, attached as Exhibit A, and that the contents thereof are true to the best of my knowledge, information, and belief.


John J. McDonnell, Special Agent
United States Drug Enforcement Administration

Date: March 15, 2013

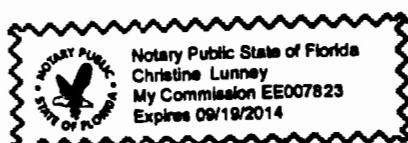
STATE OF FLORIDA,)
)
 ss
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared

John J. McDonnell,

who, having produced his United States Drug Enforcement Administration Credentials (No. 7039) as identification and having been duly sworn, deposes and says that the foregoing affidavit, attached as Exhibit A, is true and correct to the best of his knowledge, information and belief.

Witness my hand and official seal in the State of Florida, County of Palm Beach, this 15th day of March, 2013.




Christine Lunney
Notary Public
State of Florida